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VINCENT L. BRICCETTI\*

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(914) 946-5900

January 15, 2008

FAX (914) 946-5906

\*ALSO ADMITTED IN CT

\*\*ALSO ADMITTED IN VA & DC

**VIA FAX (212) 637-2527**

Antonia M. Apps, Esq.  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007

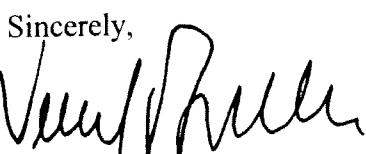
Re: United States v. Claudia Francis  
07 Cr. 672 (RJH)

Dear Ms. Apps:

By letter dated November 6, 2007, I wrote to you requesting photographs of the items seized in the search of Claudia Francis's home that could not be readily copied, such as computers and electronic equipment. In a letter I received on November 29, 2007 (although it was mistakenly dated August 27, 2007), you stated that you would produce any such photographs as soon as you were able to do so. To date you have not done so. This is my second request for such photographs.

In addition, it is my experience that agents routinely take photographs and/or videotapes during the course of a search. Please produce any and all such photographs and videotapes taken during the course of the search of Ms. Francis's home. Please also produce or make available to me any and all records regarding the time at which such photographs and videotapes were taken. Presumably, the photographs and/or videotapes were taken digitally, which would record when the photographs and/or videotapes were taken.

Given the upcoming February 1 deadline for pretrial motions, I would appreciate a response to this letter by no later than January 18, 2008.

Sincerely,  
  
Vincent L. Briccetti



United States Attorney  
Southern District of New York

RECEIVED

JAN 31 2008

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BRICCETTI, CALHOON & LAWRENCE LLP

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 30, 2007

**BY FEDERAL EXPRESS**

Vincent J. Briccetti, Esq.  
Briccetti, Calhoun & Lawrence, LLP  
81 Main Street, Suite 450  
White Plains, New York 10601

Re: United States v. Jhamel Sean Francis, et al.  
07 Cr. 672 (RJH)

Dear Mr. Briccetti:

I write in response to your letter of January 15, 2008 requesting copies of any photographs taken of items such as computers and other electronic equipment that were seized in the search of Claudia Francis' home on November 6, 2007. Enclosed please find a CD with bates number 03173 which contains photographs of such seized items.

You state in your letter that, in your experience, agents take photographs and videos during the course of their searches. In this case, no video of the search was taken. There were photographs taken; however, these turned out to be overexposed and accordingly the Government has not produced them. The photographs on the enclosed CD were taken after the seized items were placed in FBI storage.

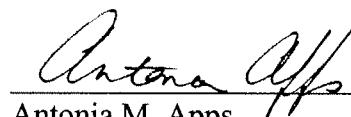
Also enclosed are documents provided by Best Buy (03174-03182) and documents provided by DHL (03183-03193). As before, we have redacted the victims' names and personal identification information from these documents in order to protect the victims' information. I have also enclosed a list identifying by bates number and victim number which victims the documents relate to. Please call me if you have any questions.

Vincent J. Briccetti, Esq.  
January 30, 2008  
Page 2

Very truly yours,

MICHAEL J. GARCIA  
United States Attorney  
Southern District of New York

By:

  
\_\_\_\_\_  
Antonia M. Apps  
Assistant United States Attorney  
(212) 637-2198

cc: Sam Braverman, Esq. (attorney for Ebony Dennis) (with enclosures)  
Jason Russo, Esq. (attorney for Domink Rawle) (with enclosures)  
Marilyn S. Reader, Esq. (attorney for Jhamel Francis) (with enclosures)  
Nancy Ennis, Esq. (attorney for Lennie Nurse) (with enclosures)  
John Byrnes, Esq. (attorney for Kenneth Francis) (with enclosures)

## Additional Discovery (03174 - 03193)

Bates	Victim Number
03174 - 03182	6
03183	5
03184	3
03185	4
03186	8
03187	30
03188	1
03189 - 03190	31
03191	6
03192	32
03193	33